

Manager
Securities Operations

NEW YORK STOCK EXCHANGE, Inc.
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New York, NY 10005

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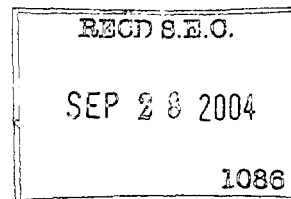
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September 28, 2004

Mr. Brian Johnson
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 1004 -- STOP/1-4
450 Fifth Street, NW
Judiciary Plaza
Washington, DC 20549



Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Exchange Act of 1933, Primus Guaranty, Ltd., Common Shares, par value \$0.01 per share. The NYSE requests simultaneous acceleration of registration of the Securities Exchange Act of 1934, together with the 1933 Act. Adequate distribution assured. Form 8-A received on September 28, 2004. Tentative listing date – September 30, 2004.

Sincerely,

Paul Madhoo

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